



U.S. Department of Energy
Office of River Protection
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

04-ESQ-0243

OCT 22 2004

04-WTP-249

Mr. J. P. Henschel, Project Director
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Henschel:

CONTRACT NO. DE-AC27-01RV14136 – APPROVAL OF MULTIPLE EXTENSION REQUESTS FOR SUBMITTAL OF AUTHORIZATION BASIS AMENDMENT REQUESTS (ABAR) AND RECONCILIATION OF DECISIONS TO DEVIATE (DTD)

- References:
1. BNI letter from J. P. Henschel to R. J. Schepens, ORP, "Extension Requests for Multiple Authorization Basis Amendment Requests and Decisions to Deviate," CCN: 094062, dated September 27, 2004.
 2. BNI letter from J. P. Henschel to R. J. Schepens, ORP, "Transmittal of Decision to Deviate from the Authorization Basis for the Hanford Tank Waste Treatment and Immobilization Plant (24590-HLW-DTD-ENS-04-0003, Revision 0," CCN: 090783, dated June 9, 2004.
 3. BNI letter from J. P. Henschel to R. J. Schepens, ORP, "Request for Extension to Submit Page Changes per U.S. Department of Energy Approval of Authorization Basis Amendment Requests 24590-WTP-SE-ENS-04-013, Revision 0, and 24590-WTP-SE-ENS-04-093, Revision 0," CCN: 100471, dated October 4, 2004.
 4. ORP letter from R. J. Schepens to J. P. Henschel, BNI, "Approval of Extension Request for Submittal of Authorization Basis Amendment Request (ABAR) Related to Elimination of the High Level Waste (HLW) Concentrate Receipt Vessels (HCP-VSL-00001 and 2) (24590-WTP-SE-ENS-04-092)," 04-WTP-133, dated June 24, 2004.

Reference 1 requested a two-week extension until October 29, 2004, of the submittal of ABAR 24590-WTP-SE-ENS-03-051 (related to ammonia storage tanks) to provide additional ABAR preparation time, extension of the review of ABAR 24590-WTP-SE-ENS-04-41 (related to non-Newtonian tank sparger additions) associated with four DTDs from June 26, 2004, until November 30, 2004, and extension of the commitment to make standards changes related to pretreatment overflow interlocks associated with ABAR 24590-WTP-SE-ENS-03-188 from September 29, 2004, until November 18, 2004.

Reference 2 requested a second extension of the reconciliation of ABAR 24590-HLW-DTD-ENS-04-0003 (related to elimination of the high level waste concentrate receipt vessels and the

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associated DTD) from October 7, 2004, to November 30, 2004. The reconciliation of this ABAR was previously extended thirty days by Reference 4.

Reference 3 requested a two-week extension until October 15, 2004, of implementation of page changes to the Safety Requirements Document described in ABAR 24590-WTP-SE-ENS-04-013 and 04-93 (related to vacuum box testing and automated weld inspection requirements).

After a review of the unique circumstances of each request, the referenced requests are approved. The approvals are based on Bechtel National, Inc.'s (BNI) explanation that additional time was necessary for the required work to be completed, and U.S. Department of Energy (DOE), Office of River Protection's (ORP) understanding that significant construction activities related to these requests would not occur prior to their approval; i.e., that the likelihood of significant rework due to changes arising from the requested delays in obtaining the required approvals of revised hazard and safety analyses is small, notwithstanding procurement or design work that may be occurring related to these changes. (BNI is requested to confirm ORP's understanding concerning the likelihood of rework related to these extensions is small, for each of these extensions.)

ORP is concerned that the frequency and duration of these extension requests has increased significantly in the last month. The existing thirty-day limit on submittal of ABARs to reconcile DTDs, and ninety-day limit to complete the corresponding DTD reconciliations were intended to ensure that the preliminary design is approved by DOE before it is constructed, as required by 10 CFR 830.206, while affording sufficient flexibility in meeting this 10 CFR 830.206 requirement to permit construction efficiency. Significant delays in submittal and approval of changes to the preliminary design beyond these guidelines increase the likelihood that a violation of 10 CFR 830.206 could develop. To avoid such a violation, BNI is requested to describe how it intends to improve the execution of this responsibility to ensure that future extension requests are infrequent and short in duration.

If you have any questions, please contact me, or your staff may call Lewis F. Miller, Jr., Waste Treatment and Immobilization Plant Project Safety Authorization Basis Team Leader, (509) 376-6817.

Sincerely,



Roy J. Schepens
Manager

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